

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MATTHEW STEIN and JEROME LHOTE,

23 Civ. 2508 (NRB)

Plaintiffs,

v.

SKATTEFORVALTNINGEN,

Defendant,

and

LUKE MCGEE,

Nominal Defendant.

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SKATTEFORVALTNINGEN,

Counterclaim Plaintiff,

v.

MATTHEW STEIN, JEROME LHOTE, and  
LUKE MCGEE,

Counterclaim Defendants.

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**WITNESS STATEMENT OF SKATTEFORVALTNINGEN**

Matthew Stein (“Stein”), Jerome Lhote (“Lhote”), and Luke McGee (“McGee”) designate the highlighted portions of the attached true and correct copy of the deposition of Skatteforvaltningen (“SKAT”), taken pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, as the testimony of Skatteforvaltningen, pursuant to Rule 32(a)(3) of the Federal Rules of Civil Procedure, together with Exhibits 101, 103, 104, 105, 106, 107, 108, 109, 110, 113, 114, 115, 118, 120, 121, 122, 123, 124, 125, 127, 128, 129, 130, 131, 137, 141, 141T to the deposition.

This testimony is contained in Exhibit 400.

Pursuant to Rule 36(b), Stein, Lhote, and McGee further designate SKAT’s responses to the following requests for admission served by Stein and Lhote as its testimony:

Request Nos. 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15, 16, 31, 32, 33, 34

SKAT’s responses to Stein and Lhote’s requests for admission are contained in Exhibit 401.

Pursuant to Rule 36(b), Stein, Lhote, and McGee further designate SKAT’s responses to the following requests for admission served by McGee as its testimony:

Request Nos. 2, 3A, 3B, 10, 11, 12, 13, 14, 15, 18, 19, 20, 33, 34, 35, 36

SKAT’s responses to McGee’s requests for admission are contained in Exhibit 402.

Pursuant to Rule 33(c), Stein, Lhote, and McGee further designate SKAT’s responses to the following interrogatories served by Stein and Lhote as its testimony:

Interrogatory Nos. 4, 7, 8, 9, 11, 12, 13, 16, 17

SKAT’s responses to Stein and Lhote’s interrogatories are contained in Exhibit 403.

Pursuant to Rule 33(c), Stein, Lhote, and McGee further designate SKAT's responses to the following interrogatories served by McGee as its testimony:

Interrogatory Nos. 1, 3, 4, 5, 7, 8, 9, 12, 15, 16, 17, 18, 19

SKAT's responses to McGee's interrogatories are contained in Exhibit 404.

### **Notes Regarding Deposition Exhibits**

- Exhibit 101 also includes an amended translation provided by SKAT in advance of the deposition.
- Exhibit 103 also includes an amended translation provided by SKAT after the deposition.
- Exhibit 106 is a Danish language document and an English translation of the original Danish language document. Also included with Exhibit 106 is a corrected translation of the original Danish language document that was produced by Stein and Lhote and Bates numbered as STEIN\_LHOTE0009980-82.
- For deposition exhibits where pages were cut off, *i.e.*, Exh. 107, 110, 113, 118, 121, 124, and 125, versions of the same pages where the pages are not cut off are included.